

**Federal Defenders  
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April 25, 2022

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Willie Dennis  
20 Cr. 623 (LGS)**

Dear Judge Schofield,

We write on behalf of Willie Dennis pursuant to the scheduling order in the above-captioned matter to inform the Court that Mr. Dennis does not intend to file dispositive or suppression motions. *See* [Dkt. 31](#). Instead, Mr. Dennis respectfully requests that that Court convene a status conference at its earliest convenience, before the next currently scheduled appearance on June 1, 2022 if possible, so that the parties and the Court may discuss and set a schedule for trial in this matter.

Mr. Dennis's professional, financial, and personal lives have been severely damaged by the allegations in this case. In addition to the significant restrictions that have been placed on Mr. Dennis's liberty despite no adjudication of guilt and no past criminal history, Mr. Dennis has been effectively prevented from gainful employment as a practicing attorney while the allegations in this case remain pending. Because the facts and allegations in this case overlap with the issues in his pending civil employment matters, those matters have also been stayed pending resolution of this case. So long as this case remains pending, Mr. Dennis will be unable to work, unable to seek monetary restitution relating to his dismissal from his former law firm partnership, and unable to reverse his continued decline into destitution, distress, and worsening physical health. *See Moore v. Arizona*, [414 U.S. 25, 27](#) (1973) (per curiam) (recognizing that public accusation "'may disrupt [the defendant's] employment, drain his financial resources, curtail his associations, subject him to public obloquy, and create anxiety in him, his family and his friends,'" and noting that "[t]hese factors are more serious for some than for others, but they are inevitably present in every case to some extent, for every defendant will either be incarcerated pending trial or on bail subject to substantial restrictions on his liberty" (citations omitted)).

United States v. Dennis

20 Cr. 623 (LGS)

Mr. Dennis has directed the undersigned to request a trial date as soon as practicable for the Court and the parties, so that he can put an end to this prosecution and begin the process of rebuilding his life. Accordingly, recognizing that certain logistical issues need to be resolved for this matter to be submitted and scheduled for trial, particularly while pandemic restrictions on trials in this District remain in place, we respectfully request that the Court convene a status conference to discuss setting a trial date and pretrial schedule in this matter.

In light of Mr. Dennis's current residence in the Middle District of Florida and the cost of travel to, and lodging in, New York, we also respectfully request that the Court convene the requested conference via videoconferencing or, in the alternative, permit Mr. Dennis to participate remotely.

We thank the Court for its consideration of these requests.

Respectfully submitted,


/s/ Neil Kelly

Neil P. Kelly  
Assistant Federal Defender  
(212) 417-8744

cc: AUSA Sarah Kushner

Application Granted. The status conference currently scheduled for June 1, 2022, is rescheduled to **May 2, 2022, at 4:30 p.m.** and will proceed via videoconference. The Court will send a conference link via email. Members of the press and public may dial into this conference using Conference Call In Number: (888) 363-4749; and Access Code: 558-3333.

Dated: April 26, 2022  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**